



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

January 29, 2004

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.in.gov/idem](http://www.in.gov/idem)

TO: Interested Parties / Applicant

RE: Ruskin Company Rochester Plant / 049-18390-00024

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

## Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures  
FNPER-AM.dot 9/16/03

January 29, 2004

Mr. Scott Marquardt  
Ruskin Company Rochester Plant  
510 State Rd. 25 North  
Rochester, Indiana 46975

Re: **049-18390-00024**  
Transfer of Ownership for  
Exempt Operation Status  
049-15736-00024

Dear Mr. Marquardt:

A letter notifying the Office of Air Quality (OAQ) of a change in ownership was received on January 12, 2004. The following is a revision of the Exempt Operation Status acknowledging the transfer of ownership of Lau Industries Rochester Plant to Ruskin Company Rochester Plant at the same location.

The application from Lau Industries Rochester Plant, received on June 13, 2002, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following operation of a blower fan parts and housing manufacturing source located at 510 State Rd. 25 North, Rochester, Indiana 46975, is classified as exempt from air pollution permit requirements:

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) dip coating tank, identified as E-Coat Dip Coater, installed in 1996, exhausted through stack PR1, capacity: 150 blower fan parts per hour.
- (b) One (1) manual touch up paint spray booth, identified as Manual Spray Booth, equipped with HVLP spray applicators, and dry filters for PM overspray control, installed in 1996, exhausted through stack MT1, capacity: 12 blower fan parts per hour.
- (c) One (1) natural gas fired Dip Coater drying oven, identified as OV1, installed in 1996, exhausted to stack OB1, rated at: 5.00 million British thermal units per hour.
- (d) Three (3) ancillary deionized water rinse tanks, installed in 1996, exhausted to stack RO1.
- (e) One (1) spot welding process, containing two (2) welding stations, identified as 2X and 7X, installed in 1996. Station 2X consists of seven (7) spot welders and station 7X consists of two (2) spot welders. These welding operations do not use any wire. Spot welding uses heat to bond metal together.

- (f) One (1) forced air furnace, identified as MU-E, installed in September 1999, rated at: 1.87 million British thermal units per hour.
- (g) One (1) forced air furnace, identified as MU-W, installed in September 1999, rated at: 1.87 million British thermal units per hour.
- (h) One (1) forced air furnace, identified as MU-O, installed in September 1999, rated at: 0.18 million British thermal units per hour.
- (i) One MIG weld process, containing three (3) MIG welding stations, identified as 2x-mig, installed in March 2002, capacity: 1.049 pounds of metal wire per hour, each.
- (j) One (1) natural gas fired Maxon water heater, identified as WH-1, installed in 1996, exhausted to stack OB1, rated at 3.0 million British thermal units per hour.
- (k) One (1) natural gas fired Maxon water heater, identified as WH-2, installed in 1996, exhausted to stack OB1, rated at 3.8 million British thermal units per hour.

The following conditions are applicable to these emission units:

#### **Emission Limitations and Standards**

1. 326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies)
  - (a) Pursuant to 326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies), the particulate (PM) from the one (1) manual touch up paint spray booth, identified as Manual Spray Booth, shall be controlled by dry particulate filters, and the control device shall be operated in accordance with manufacturer's specifications.
  - (b) The particulate (PM) from the three (3) MIG welding stations, identified as 2x-mig, shall be limited to 4.92 pounds of PM per hour at a process weight rate of 2,625 pounds per hour using the following equation:  
  
Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:  
  
$$E = 4.10 P^{0.67}$$
where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour
  - (c) Any change or modification which will cause the potential to emit PM to increase to greater than 1.00 pound per hour, equivalent to 4.38 tons per year, from the three (3) MIG welding stations shall obtain prior approval from the IDEM, OAQ. This will ensure that the potential to emit PM from the entire source remains below five (5) tons per year.
2. 326 IAC 8-2-9 (Miscellaneous Metal Coating)
  - (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to the metal fan parts at the one (1) dip coating tank, identified as E-Coat Dip Coater, shall be limited to 3.5 pounds of VOCs per gallon of

coating less water, for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

- (b) The VOC applied to the applicators of the manual touch up paint spray booth, identified as Manual Spray Booth, installed in 1996, shall be limited to less than fifteen (15) pounds per day. Therefore, the requirements of 326 IAC 8-2-9 are not applicable. Compliance with this limit shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the day.

### **Record Keeping and Reporting Requirements**

#### **3. General Record Keeping Requirements**

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to

any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

**4. Record Keeping Requirements**

- (a) To document compliance with Condition 2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition 2.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each day;
  - (4) The total VOC usage for each day; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Condition 3 - General Record Keeping Requirements, of this exemption.

This exemption is the fourth air approval issued to this source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

If you have any questions, please contact Janet Mobley at 317-232-8369 or at 1-800-451-6027 extension 2-8369.

Sincerely,  
Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief  
Permits Branch

Ruskin Company Rochester Plant  
Rochester, Indiana

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Office of Air Quality

cc: File - Fulton County  
Fulton County Health Department  
Air Compliance Section - Rick Reynolds  
IDEM Northern Regional Office  
Compliance Data Section  
Policy Planning & Coordination Section - Chet Bohannon  
Permit Review Section II - Janet Mobley